

REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 96-106 are pending in the present application. Claims 96, 98, 101-103 and 106 are amended by the present amendment.

Claim amendments find support in the specification as originally filed. Thus, no new matter is added.

In the outstanding Office Action, the claims were objected to; the drawings were objected to; the specification was objected to; Claims 96, 101-103 and 106 were rejected under 35 U.S.C. § 112, second paragraph; Claims 96-98, 102 and 106 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,734,824 to Choi et al. (herein "Choi") in view of U.S. Patent No. 6,614,782 to Wehrend; Claims 99, 100 and 103-105 were rejected under 35 U.S.C. § 103(a) as unpatentable over Choi in view of Wehrend and U.S. Patent No. 6,332,159 to Hatae; and Claim 101 was rejected under 35 U.S.C. § 103(a) as unpatentable over Choi in view of Wehrend and U.S. Patent No. 6,643,258 to Ise.

Regarding the objection to the claims, Applicants respectfully submit that the meaning of the term contents data would be understood by one of skill in the art. However, in light of the comments in the outstanding Office Action, "contents data" is amended to be "contents," which should definitely be clear. Accordingly, it is respectfully requested the objection to the claims be withdrawn.

Further, regarding the objection to the drawings, Applicants respectfully traverse the assertion in the outstanding Office Action that the drawings do not show the features of Claims 96-106. On the contrary, Applicants submit that all the features in Claims 96-106 are shown in the drawings.

In a non-limiting example, Applicants' Figure 1 shows an example of the features in claim 96 in such a way that the first 1394 bus 11 may correspond to the claimed first network, the second 1394 bus 12 may correspond to the claimed second network, the first AV control terminal 2 may correspond to the claimed first collection unit, the second AV control terminal 5 may correspond to the claimed second collection unit, each of the first and second AV control terminals 2 and 5 may correspond to the claimed memory unit, each of the first and second AV control terminals 2 and 5 may correspond to the claimed display control unit, a combination of the first AV control terminal 2 and the first half gateway 3 may correspond to the claimed first set up unit, a combination of the second half gateway 4 and the second AV control terminal 5 may correspond to the claimed second set up unit, the first half gateway 3 may correspond to the claimed reception unit, the second half gateway may correspond to the claimed transmission unit, the transmitting terminal 1 may correspond to the claimed transmitting terminal, and the receiving terminal 6 may correspond to the claimed receiving terminal. Further, Applicants' Figure 5 shows a non-limiting example of the operation of each element shown in Applicants' Figure 1.

In addition, each of the first and second AV control terminals may correspond to the claimed display unit of claim 97, the first half gateway 3 may correspond to the claimed decoding unit of claim 98, the first AV control terminal 2 may correspond to the claimed command unit of claim 101, and the second AV control terminal 5 may correspond to the claimed command unit of claim 103.

Accordingly, at least for the reasons discussed above, Applicants respectfully submit that the drawings show each of the features of the claimed inventions. Thus, Applicants request the objection to the drawings be withdrawn.

Regarding the objection to the specification, the summary of the specification is amended to more clearly recite the features of the claimed invention. Accordingly, it is respectfully requested the objection to the specification also be withdrawn.

Further, regarding the rejection of claims under 35 U.S.C. § 112, second paragraph, Claims 96, 101-103 and 106 are amended to more clearly recite the claimed features. In particular, the claims are amended to more clearly indicate that the transmitting terminal is a terminal device on the first network, the receiving terminal is a terminal device on the second network, the connection set up by the first set up unit is on the first network, and the channel set up by the second set up unit is on the second network. Accordingly, Applicants respectfully request that rejection be withdrawn.

In addition, Applicants respectfully traverse the rejection under 35 U.S.C. § 103(a) of Claims 96-98, 102 and 106 as unpatentable over Choi and Wehrend.

Applicants respectfully submit that the disclosures of Choi and Wherend, whether taken individually or in combination, fail to teach or suggest each feature of the independent claims. Further, Applicants respectfully traverse the assertion in the outstanding Office Action that the claimed first and second collection units correspond to the NMM described by Choi at column 9, lines 23-25 and column 10, lines 62-63 and 53-56. However, Applicants respectfully submit that the cited passages of Choi actually describe the bridge 50 and its operations.

Further, Applicants respectfully note that the NMM (Network Management Module) is a module, associated with only one specific LAN as shown in Fig. 7, which controls and monitors communication between the stations of the LAN and communications in and out of the LAN.¹ Thus, the NMM is a physically and functionally separate entity from the bridge.

¹ Choi at column 1, line 65 to column 2, line 1.

In addition, Choi indicates that the bridge has a separate filtering database associated with each port,² and Choi describes that when a message containing a source address SA and a destination address DA is received from the station or NMM, the bridge examines the sender station address SA to determine that the sender station is associated with the port through which the message was received and updates the filtering database associated with that port with the SA value.³ Thus, Choi's bridge only updates its filtering database by the sender address of the sender of the received message.

In contrast, the claimed first and second collection units are explicitly required to collect the address and attribute information of each terminal device connected to the respective networks, not just a sender of a received message, by inquiring a type of each terminal device and/or contents possessed by each terminal device, and the attribute information containing the address of each terminal device. In this regard, the filtering database of Choi's bridge only records from which port a message enters the bridge, and which station or NMM was the sender for that message,⁴ so that Choi's bridge actually does not collect any attribute information of each terminal device and does not inquire a type of each terminal device and/or contents possessed by each terminal device, and the attribute information containing the address of each terminal device.

In addition, Applicants respectfully traverse the assertion in the Office Action that the claimed memory unit is disclosed by Choi at column 10, lines 64-66. However, as discussed above, the cited portion of Choi only describes the updating of the filtering database of the bridge by the sender address of the sender of the received message, so that Choi's bridge actually does not store the address and the attribute information of each terminal device.

Further, Applicants respectfully traverse the assertion in the Office Action that the claimed display control unit is disclosed by Choi at column 14, lines 17-20. However, the

² Choi at column 10, lines 33-34.

³ Choi at column 10, lines 53-63.

⁴ Choi at column 10, lines 56-59.

cited portion of Choi actually describes the operation of the NMM, not the bridge, to construct the displayable active topology from the adjacent information of the other LANs collected by each NMM, which is totally different from the sender station address stored in the filtering database of the bridge. Therefore, Choi's NMM actually does not enable display of information stored in the claimed memory unit (identified with Choi's filtering database in the Office Action).

Furthermore, Applicants respectfully traverse the assertion in the Office Action that the claimed first and second setup units are disclosed by Wehrend at column 13, lines 18-20, 7-8 and 21-22. However, the cited portion of Wehrend actually describes a set up of a connection between the first network coupling unit WAML1 and the second network coupling unit WAML2 through the communication network KN, which is neither a connection on the first network between the transmitting terminal (corresponding to Wehrend's KE1) and the relay device (corresponding to Wehrend's KS1) to be set up by the claimed first set up unit. Thus, the cited portion of Wehrend does not teach or suggest a channel on the second network between the receiving terminal (corresponding to Wehrend's KE3) and the relay device (corresponding to Wehrend's KS2) to be set up by the claimed second set up unit.

Moreover, Wehrend indicates that setting up a connection between the first network coupling unit WAML1 and the second network coupling unit WAML2 takes place upon arrival of the data packets to the first network coupling unit WAML1. Thus, the setting up of a connection of Wehrend does not take place upon receiving a request for transmission of the contents from the transmitting terminal to the receiving terminal, where the transmitting terminal and the receiving terminal are selected according to the display of information stored in the memory unit and enabled by the display control unit, as required for the claimed first set up unit.

In addition, Applicants respectfully traverse the assertion in the Office Action that the claimed reception unit and transmission unit are disclosed by Wehrend at column 13, lines 9-11 and 34-37. However, that portion of Wehrend actually fails to describe any operation for receiving contents from a transmitting terminal (corresponding to Wehrend's KE1) at the relay device (corresponding to Wehrend's KS1) through the connection set up by the first set up unit (identified, in the Office Action, with the connection between WAML1 and WAML2), or transmitting the contents to the receiving terminal (corresponding to Wehrend's KE3) at the relay device (corresponding to Wehrend's KS2) through the channel setup by the second set up unit (identified, in the Office Action, with the connection between WAML1 and WAML2).

Consequently, Applicants respectfully submit that the combined disclosures of Choi and Wehrend fails to teach or suggest all the units constituting the relay device recited in Claim 96, and therefore it is logically impossible to consider a combination of Choi and Wehrend as obviating Claim 96. Similarly, Choi and Wehrend fail to teach or suggest the corresponding method Claim 106, and the dependent Claims 97-105.

Accordingly, Applicants respectfully submit that independent Claims 96 and 106, and claims depending therefrom, patentably define over Choi and Wehrend.

Applicants also respectfully traverse the rejections of Claims 99-100 and 103-105 as unpatentable over Choi, Wehrend and Hatae, and Claim 101 as unpatentable over Choi, Wehrend and Ise.

Claims 99-101 and 103-105 depend from independent Claim 96, which as discussed above is believed to patentably define over Choi and Wehrend. Further, the remaining references in the Office Action fail to disclose or suggest the claimed features lacking in the combined disclosure of Choi and Wehrend. Accordingly, it is respectfully requested those rejections be withdrawn.

Accordingly, Applicants respectfully submit that independent Claims 96 and 106, and claims depending therefrom, are allowable.

Further, Applicants note that an indication of consideration of the references in the IDS, filed on February 1, 2005 and June 22, 2005, has not been received. Accordingly, Applicants respectfully request an initialed copy of PTO Form 1449 indicating consideration of the references, filed with the IDS on February 1, 2005 and June 22, 2005.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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